



Rec'd 5/15/02 JK

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

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W. Tayloe Murphy, Jr.
Secretary of Natural Resources

Robert G. Burnley
Director

(804) 698-4000
1-800-592-5482

DIVISION OF WASTE PROGRAM COORDINATION OFFICE OF WASTE PERMITTING

May 6, 2002

John S. Henley, P.E.
Chief, Facilities Management
District of Columbia, Department of Corrections
8515 Silverbrook Road
P.O. Box 25
Lorton, Virginia 22079

RE: Closure Verification of Surface Impoundment Area (Laundry Wastewater Clarifier) [S04]
District of Columbia Department of Corrections¹
Lorton Correctional Complex
EPA I.D. VAD980930988

Dear Mr. Henley:

The Department of Environmental Quality's (DEQ) Office of Waste Permitting received the subject Closure Report dated November 15, 2001, and associated closure certifications dated November 9, 2001. A closure verification inspection was performed by Mark Campbell, on October 22, 2001. The closure certifications, the result of closure verification inspection and the justifying closure report have been reviewed.

Based on this review, clean closure of the concrete and unsaturated soils to a residential risk-based standard was achieved for the Laundry Wastewater Clarifier. Therefore, the DEQ concurs that clean closure of the concrete and unsaturated soils associated with the Laundry Wastewater Clarifier has been achieved. Please note, however, that EPA retains the authority to address possible corrective action of continuing releases pursuant to the Hazardous and Solid Waste Amendments of 1984.


¹ Closure Verification/Clean Closure Acceptable [CL380/CA]

Mr. Henley
May 6, 2002
Page 2

The groundwater data from the Groundwater Monitoring Report: Addendum to the Final Closure Report, dated January 25th, 2002 has also been reviewed. Based on the results of the five quarters of groundwater sampling, the Laundry Wastewater Clarifier at the Lorton Correctional Facility has met the current clean-closure performance standards for groundwater.

If you have any questions regarding this letter, please contact Mark Campbell, Environmental Engineer Senior, of my staff at (804) 698-4125 or macampbell@deq.state.va.us.

Sincerely,


for Robert G. Burnley
Director

c: John Bowden, NVRO
Debra Miller, OWP
Howard Freeland, OWP
Sanjay Thiranagari, OTA
Mark Campbell, OWP
Richard Doucette, OWP
Claire Ballard, OWP
Joanne Cassidy, EPA Region 3 (3WC21)

Charles Kirk, AAS Environmental
8501 Silverbrook Road
Lorton, Virginia 22079

WP2001, No. 772
WP2002, No. 155



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

W. Tayloe Murphy, Jr.
Secretary of Natural Resources

Northern Virginia Regional Office
13901 Crown Court
Woodbridge, VA 22193-1453
(703) 583-3800 fax (703) 583-3801
www.deq.state.va.us

Robert G. Burnley
Director

Gregory L. Clayton
Regional Director

MEMORANDUM

To: Jon D. Terry

From: Stacey M. Rosenquist *smr*

Date: April 22, 2002

Subject: DC Department of Corrections
VAD980830988
Site Visit – April 16, 2002

cc: Claire Ballard
Anne Crosier

On April 16, 2002, I met with Steve Batshon (AAS Environmental 703-399-3485) at the DC Department of Corrections (DCDC) facility in Lorton. During the visit, we visited the Metal Shop, Print Shop, Body Shop, Ink Pit, and Facilities Maintenance <90-day area.

DCDC shut down all operations in 2001 and subsequently closed in December 2001.

The Metal Shop, Print Shop, and Body Shop were empty of waste and equipment.

The Ink Pit contained some rainwater. Steve adjusted the cover to keep additional rainwater out of the Ink Pit (See Attachment 1 – pictures). The groundwater monitoring wells were in good condition and locked. AAS Environmental conducted the last groundwater-sampling event in December 2001. AAS Environmental has not performed groundwater sampling for the January/February/March 2002 quarter. According to Richard Doucette (DEQ Groundwater Program) the Groundwater monitoring plan requires DCDC to conduct quarterly sampling of the groundwater until the facility has achieved clean closure (See Attachment 2-April 18, 2002, email).

Facility Maintenance employees take the non-hazardous and hazardous wastes to the Facilities Maintenance <90-day area. From this area, the waste is consolidated, repackaged and labeled prior to shipment offsite to an approved facility. Steve Batshon continues to conduct weekly inspections of the area and inventories the waste during each inspection. At the time of this visit, it appeared that not all the containers of waste were labeled, dated or closed (See Attachment 1 – pictures).

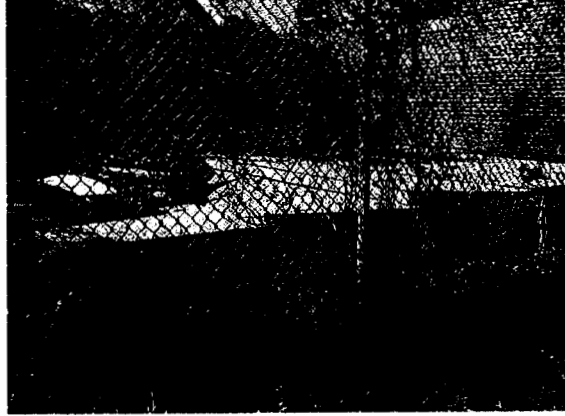
The most recent waste pickup was on March 14, 2002. All waste was transported by Clean Venture Inc.(NJ0000027193) to Cycle Chem Inc. (PAD067098822). AAS Environmental had copies of the manifests and associated Land Disposal Restriction Notifications for that waste.

DCDC did not file the 2001 Biennial Report by March 1, 2002. AAS Environmental is compiling the data and plans to submit the report by April 22, 2002.

ATTACHMENT 1



Ink Pit – covered with wooden frames



Ink Pit – covered with wooden frames



Ink Pit – covered with wooden frames



<90-Day Area – Facilities Maintenance
Containers of waste.



<90-Day Area – Facilities Maintenance
Containers of waste.



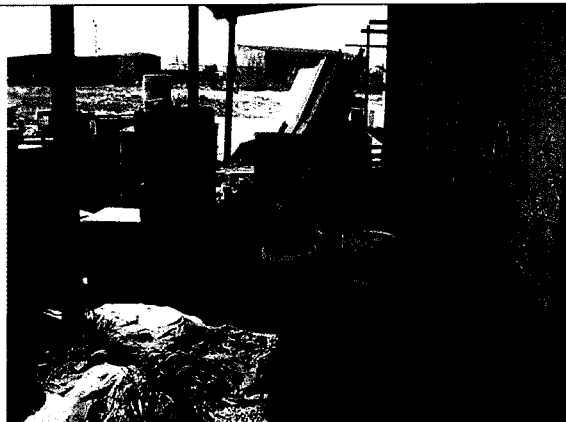
<90-Day Area – Facilities Maintenance
Containers of waste.



<90-Day Area – Facilities Maintenance
Containers of waste.



<90-Day Area – Facilities Maintenance
Containers of waste.



<90-Day Area – Facilities Maintenance
Containers of waste.



<90-Day Area – Facilities Maintenance
Containers of waste.



<90-Day Area – Facilities Maintenance
Containers of waste.

DCDC Site Visit - April 16, 2002

Pictures taken by Stacey M. Rosenquist

ATTACHMENT 2

Rosenquist, Stacey

From: Doucette, Richard
Sent: Thursday, April 18, 2002 3:04 PM
To: Rosenquist, Stacey
Cc: Freeland, Howard
Subject: Lorton Correctional Facilities - Current Deliverable and Quarterly Reporting

Stacy,

I have looked at the files and past phone records for the DC Corrections, Lorton Facility, and I have found at least two cases where the Facility was notified that they would have to continue quarterly sampling until they have been approved for clean closure. The first case was found in the original review of the groundwater monitoring plan, which was submitted in October 1999. I was unable to find the exact comment letter, but the reviewer's notes included the text that quarterly sampling will continue until the facility is approved for clean closure. The second case is a telephone record from Allen Brockman, from October 23, 2001. He stated that he had told Scott Heiser that "...Lorton would be responsible for continuing to collect quarterly data at least until groundwater clean closure is approved."

I attempted to call Scott Heiser today, unfortunately I was only able to leave a message and he has not responded today. I will continue to track this facility and determine when the quarterly report is due. I will go ahead and review the information they have submitted to date (5 quarters of groundwater sampling submitted on February 5, 2002) and continue to track the quarterly reports.

Thanks for your information and please contact me if you need any other information.

Richard C. Doucette
Virginia Department of Environmental Quality
Phone: (804) 698-4337
Email: rcdoucette@deq.state.va.us

Rec'd 8/22/01 JC



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Dennis H. Treacy
Director


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James S. Gilmore, III
Governor

John Paul Woodley, Jr.
Secretary of Natural Resources

MEMORANDUM DIVISION OF WASTE PROGRAM COORDINATION OFFICE OF WASTE PERMITTING

TO: Leslie A. Romanchik, Director, Office of Waste Permitting

THROUGH: Debbie Miller, Permit Manager 

FROM: Mark A. Campbell, Environmental Engineer Senior 

DATE: August 17, 2001

RE: Closure Plan, Contingent Closure Plan, Post-Closure Plan Amendment
Surface Impoundment Area (Laundry Wastewater Clarifier)
District of Columbia Department of Corrections
Lorton Correctional Complex
EPA I.D. VAD980930988

COPIES: John Bowden, NVRO
Arthur Kapell, OWP
Joanne Cassidy, EPA Region 3 (3WC21)

A request for modification of the existing closure plan, approved April 19, 2001, was received by the Department on July 19, 2001. The request was transmitted by a letter dated July 16, 2001. A copy of the letter is attached for your reference.

The requested modifications became necessary due to problems encountered during sampling of soils underneath the concrete structure of the Laundry Wastewater Clarifier. The requested modifications are summarized below.

- Collect soil samples from approximately 3½ feet below ground surface at locations 6, 7, and 8 as shown on attached Figures 1, 2, and 3.
- Collect a soil sample from approximately 12½ feet below ground surface at location 8 as shown on attached Figures 1 and 3.

- Collect a soil sample from approximately 8 feet below ground surface at location 9 as shown in Figures 1, 2, and 3.
- Collect a soil sample from approximately 7 feet below the concrete surface at location 5 as shown in Figures 1 and 2.
- Delete the sample location at the bottom of the clarifier.

It is recommended that these modifications be approved. If you have any questions regarding this memo, please contact me at x4125 or macampbell@deq.state.va.us.



AAS Environmental, Inc.
Environmental Engineering Consultants

Washington, DC
643 Lofstrand Lane
Rockville, MD 20850-1389
(301) 294-3211
(301) 294-3212 FAX

New York, NY
72 Madison Avenue
New York, NY 10016-8731
(212) 213-8700
(212) 213-7808 FAX

Baltimore, MD
225 North Calvert Street
Baltimore, MD 21202
Mail Stop - MD4-301-17-31
(410) 605-1121
(410) 605-8379 FAX

Arlington, VA
2345 Crystal Drive
Suite 1000
Arlington, VA 22202-4801
(703) 769-8299
(703) 769-1063 FAX

Harrisburg, PA
200 South 18th Street
Harrisburg, PA 17104-1205
(717) 234-8820
(717) 238-2350 FAX

RECEIVED

JUL 19 2001

DEQ WASTE DIVISION

July 16, 2001

Mark Campbell
Commonwealth of Virginia, Department of Environmental Quality
Division of Waste Operations
Waste Operations
P.O. Box 10009
Richmond, Virginia 23240

RE: Closure Plan, Contingent Closure Plan, Post-Closure Plan Amendment
Surface Impoundment Area (Laundry Wastewater Clarifier)
District of Columbia Department of Corrections
Lorton Correctional Complex
EPA I.D. VAD980930988

Dear Mr. Campbell:

The purpose of this letter is to propose an amendment to Section 7.4.2.1-"Concrete Abandonment Soil Sampling" of the Closure Plan, Contingent Closure Plan, Post-Closure Plan for the Laundry Wastewater Clarifier at the Lorton Correctional Facilities.

AAS Environmental, Inc. (AASE) conducted soil sampling for the closure of the unit during the week of June 18, 2001. Attempts to collect soil samples through the concrete structure as outlined in §7.4.2.1 were made over a three (3) day period. The sampling attempts were only partially successful due to the thickness of the concrete, which was greater than 18 inches in two attempted locations; the size, quantity and layout of reinforcing rod within the concrete; and the depth of the unit and confined nature of the work space. Four (4) of the nine (9) planned soil samples were collected. The successful sample locations are shown in Figure 1. Samples were attempted at two locations, but were abandoned due to the thickness of the concrete. The attempted sample locations are also shown in Figure 1.

The four successful soil samples, locations 1, 2, 3, and 4, were collected from approximately 0-12 inches behind the concrete walls and were analyzed for compounds on the Analyte list included in Appendix D of the Closure Plan. A summary of the analytical results is included in Table 1. The analytical data suggest that the clarifier has not significantly impacted the surrounding soil at the site.

In order to complete the assessment of the soil surrounding the wastewater clarifier AASE is proposing that the following samples be collected using direct push and/or hand auger methods:

Health and Safety

Investigations and Audits

Environmental Site Assessments

Remediation Design and Management

- Collect soil samples from approximately 3½ feet below ground surface at locations 6, 7, and 8 as shown in Figures 1, 2, and 3.
- Collect a soil sample from approximately 12½ feet below ground surface at location 8 as shown in Figures 1 and 3.
- Collect a soil sample from approximately 8 feet below ground surface at location 9 as shown in Figures 1, 2 and 3.
- Collect a soil sample from approximately 7 feet below the concrete surface at location 5 as shown in Figures 1 and 2.

AASE is proposing to delete the sample location at the bottom of the clarifier. As shown in Figure 2, historical groundwater level readings from monitoring well P-2, located adjacent to the clarifier, indicate that the bottom of the clarifier has been within the groundwater which would lead to groundwater contamination if the soil beneath the clarifier were contaminated. The fact that the analytical results of the groundwater samples collected as part of the groundwater monitoring plan show no contamination at the site resulting from the clarifier, suggests that the soil located beneath the clarifier is not contaminated.

The District of Columbia Department of Corrections and AASE would like to proceed with completing the sampling at the site as soon as possible. Please review the proposed sampling locations and respond as soon as possible with your approval/denial. Feel free to give me a call at our Lorton Field Office at 703-493-9577 if you have any questions or need any additional information.

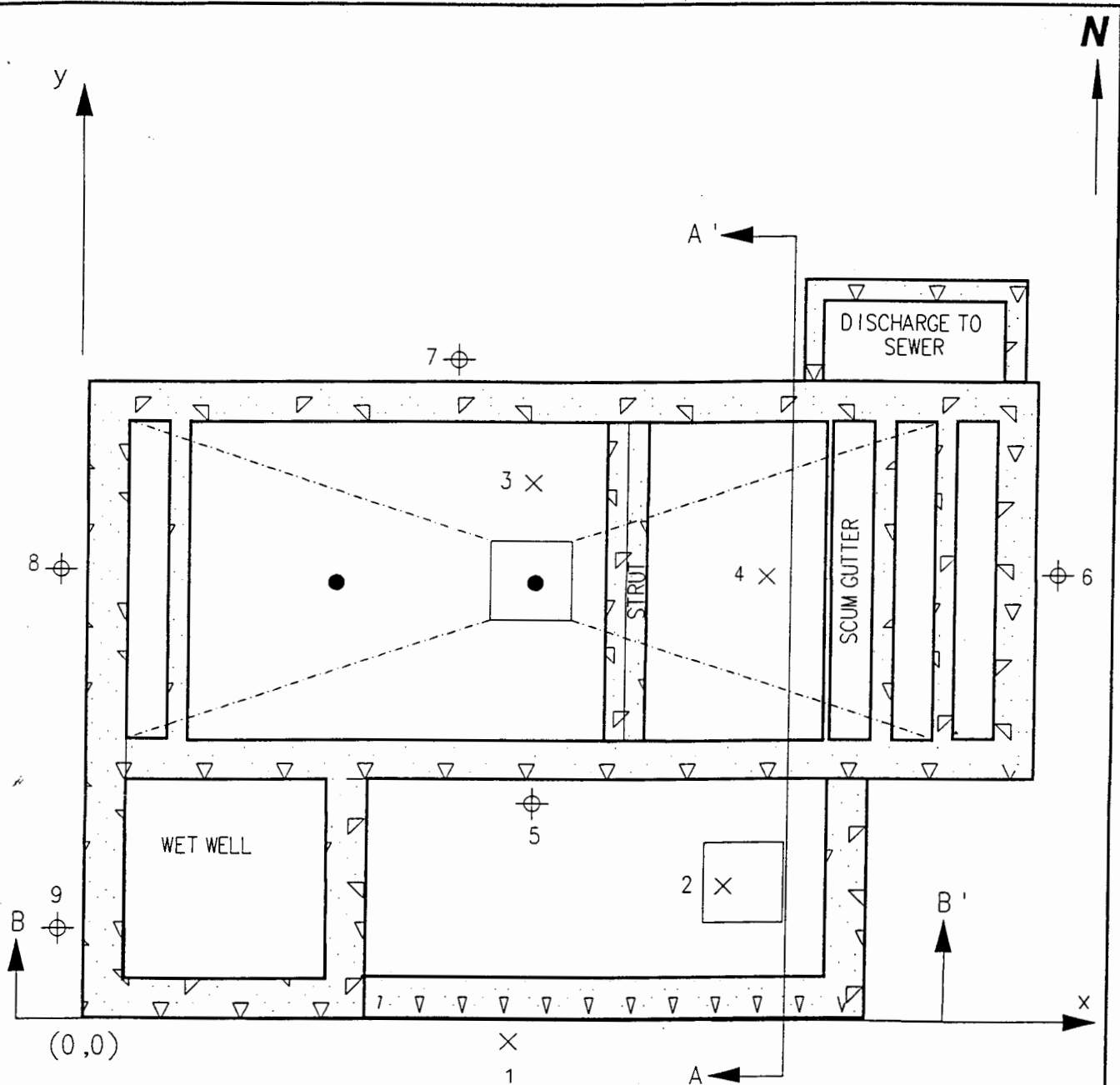
Regards,



Charles Kirk
Project Manager
AAS Environmental

cc:
John Henley DC DOC
Ajay Kapoor DC DOC
Gerard Rutkowski Heery International

Correspondence No.: 714



Sample location coordinates measured in feet from origin "0,0".
 Z direction measured in feet down from top edge of concrete.

- ⊕ Proposed Soil Sample Location
- × Successful Soil Sample Location
- Attempted Soil Sample Location

Scale 1" : 4'

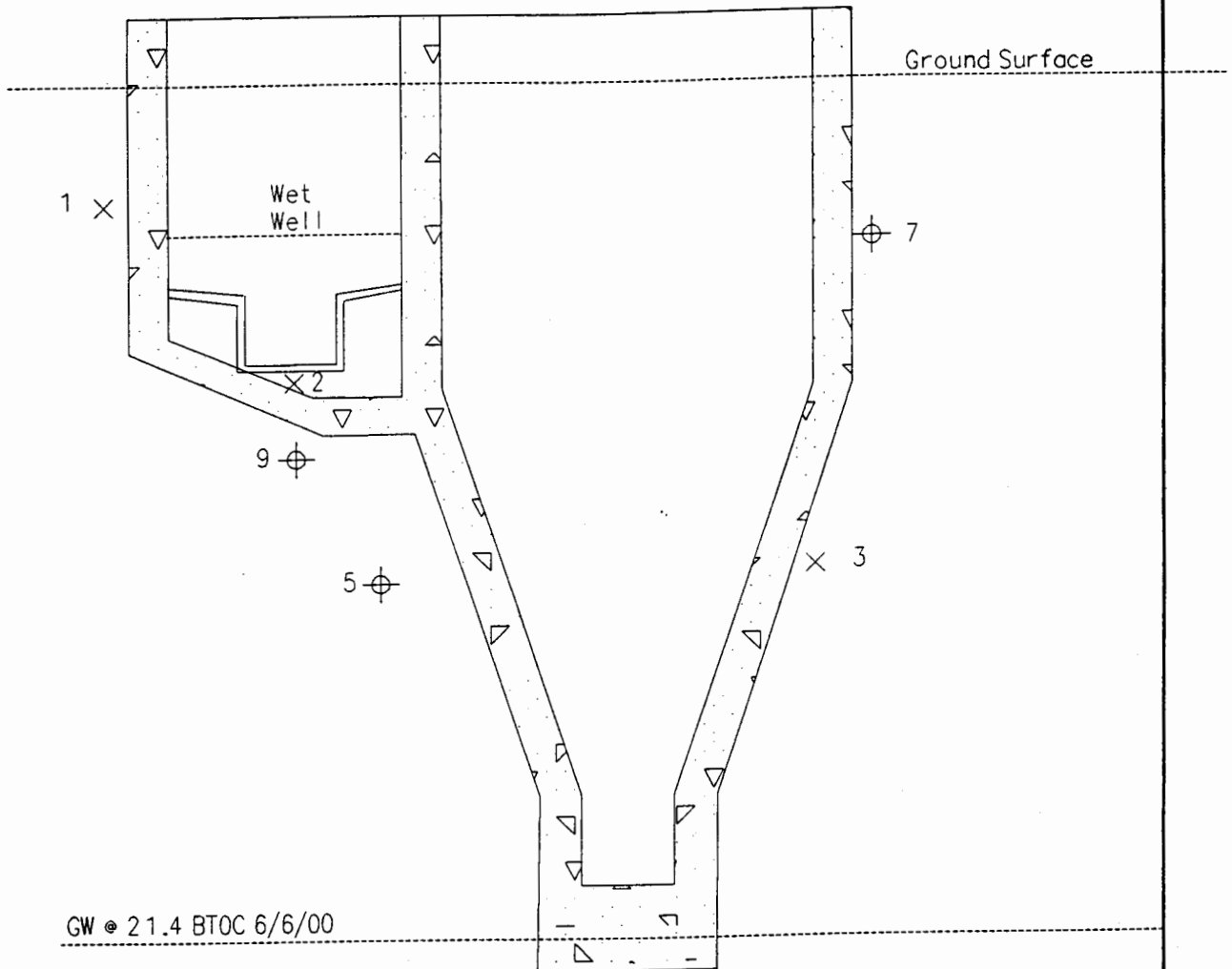
LORTON CORRECTIONAL FACILITIES - LORTON, VA
 Wastewater Clarifier Top View

Project Code : E-2937

Figure # 1



Monitoring Well P-2: Top of Casing



GW @ 21.4 BTOC 6/6/00

GW @ 22.2' BTOC 11/30/00

BTOC: Below Top of Casing

GW @ 28.54 BTOC 3/14/01

⊕ Proposed Soil Sample Location

X Successful Soil Sample Location

Scale 1" : 4'

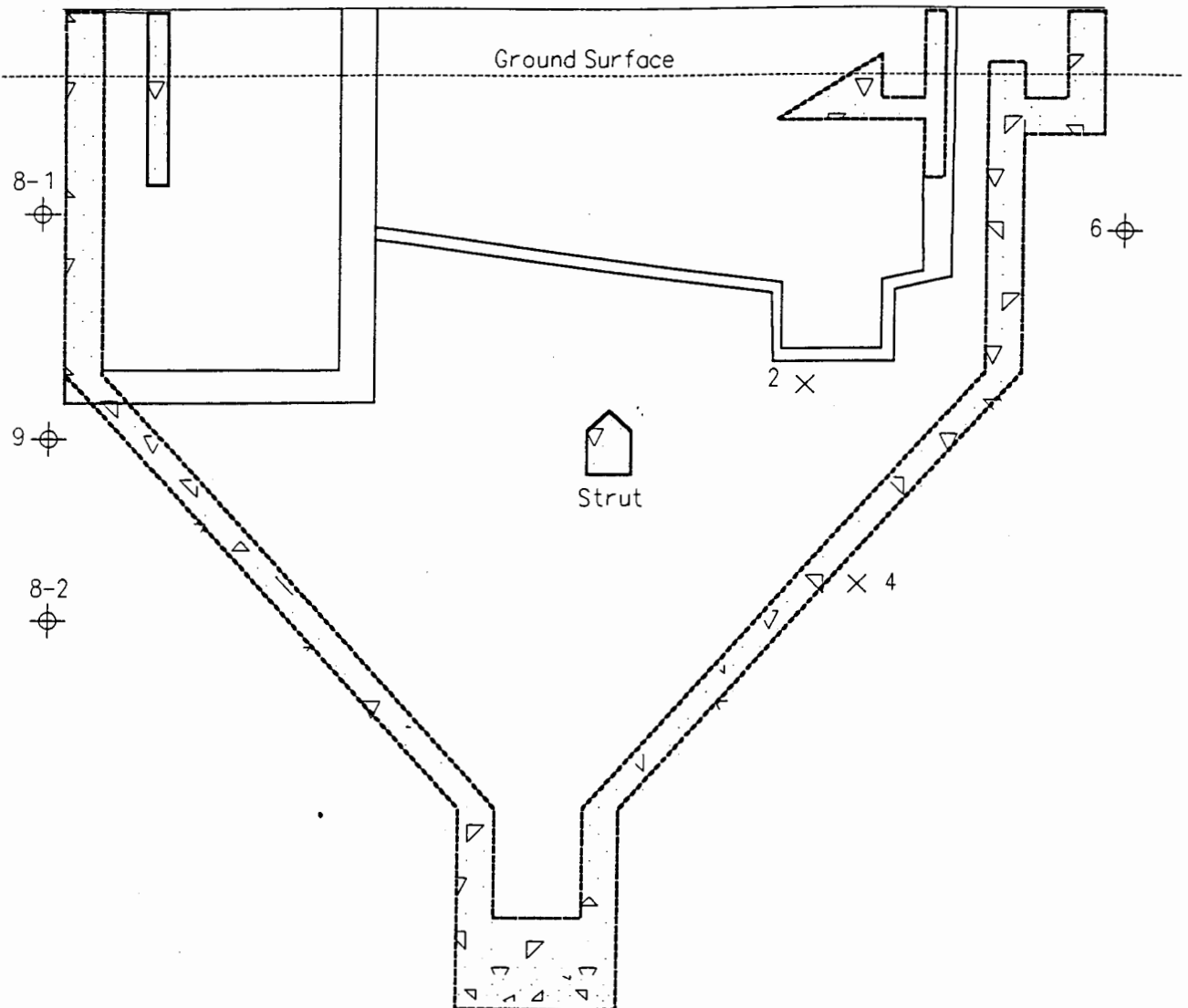
LORTON CORRECTIONAL FACILITIES - LORTON, VA
Wastewater Clarifier Side View (Facing West)
Section A-A'

Project Code: E-2937

Figure # 2



AAS Environmental, Inc.
Serving the Environmental Industry Since 1978



⊕ Proposed Soil Sample Location
 X Successful Soil Sample Location

Scale 1" : 4'

LORTON CORRECTIONAL FACILITIES - LORTON, VA
 Wastewater Clarifier Side View (Facing North)
 Section B-B'

Project Code: E-2937

Figure # 3



Table 1
Laundry Wastewater Clarifier Laboratory Data Summary

Location Number	Sample ID (Coordinates)	Matrix	Barium	Copper	Lead	Mercury	Selenium	Zinc	Bis (2-ethylhexyl) Phthalate	Butylbenzyl Phthalate	Di-n-butyl Phthalate	Napthalene
Clarifier Soil Samples												
1	SS-9.5,0,-3.5	Soil	640 mg/kg	19 mg/kg	220 mg/kg	0.1 mg/kg	<2.5 mg/kg	210 mg/kg	2300 ug/kg	<330 ug/kg	<330 ug/kg	<330 ug/kg
2	SS-16.75,3.5,-7.3	Soil	71 mg/kg	6.8 mg/kg	42 mg/kg	<0.1 mg/kg	<2.5 mg/kg	26 mg/kg	1400 ug/kg	<330 ug/kg	<330 ug/kg	50 ug/kg
3	SS-10.5, 13, -13	Soil	46 mg/kg	4.3 mg/kg	6.4 mg/kg	<0.1 mg/kg	<2.5 mg/kg	<2.5 mg/kg	<330 ug/kg	<330 ug/kg	240 ug/kg	<330 ug/kg
4	SS-17.5, 11, -12	Soil	30 mg/kg	23 mg/kg	90 mg/kg	<0.1 mg/kg	5.1 mg/kg	6300 mg/kg	82 ug/kg	<330 ug/kg	<330 ug/kg	<330 ug/kg
Location Number	Sample ID (Coordinates)	Matrix	Benzene	Chloroform	Ethyl benzene	Toluene	Xylenes					
Clarifier Soil Samples												
1	SS-9.5,0,-3.5	Soil	<5 ug/kg	<5 ug/kg	<5 ug/kg	<5 ug/kg	<15 ug/kg					
2	SS-16.75,3.5,-7.3	Soil	<500 ug/kg	<500 ug/kg	150 ug/kg	140 ug/kg	1300 ug/kg					
3	SS-10.5, 13, -13	Soil	<5 ug/kg	1 ug/kg	<5 ug/kg	<5 ug/kg	<15 ug/kg					
4	SS-17.5, 11, -12	Soil	<5 ug/kg	<5 ug/kg	<5 ug/kg	<5 ug/kg	<15 ug/kg					

Laboratory Data Summary reports results for analytes where the detected concentration exceeded the method detection limit.

Rec'd 8/21/01 J



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Director

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James S. Gilmore, III
Governor

John Paul Woodley, Jr.
Secretary of Natural Resources

DIVISION OF WASTE PROGRAM COORDINATION OFFICE OF WASTE PERMITTING

August 17, 2001

Ajay Kapoor
General Engineer
District of Columbia, Department of Corrections
8515 Silverbrook Road
P.O. Box 25
Lorton, Virginia 22079

RE: Closure Plan, Contingent Closure Plan, Post-Closure Plan Amendment
Surface Impoundment Area (Laundry Wastewater Clarifier)
District of Columbia Department of Corrections
Lorton Correctional Complex
EPA I.D. VAD980930988

Dear Mr. Kapoor:

The Department of Environmental Quality, has received a written request from your consultant, AAS Environmental, Inc., for modification of the existing closure plan, approved April 19, 2001. The request was transmitted by a letter dated July 16, 2001, which was received by the Department on July 19, 2001.

The requested modifications to the Closure Plan, Contingent Closure Plan, and Post-Closure Plan are due to problems encountered during sampling of soils underneath the concrete structure of the Laundry Wastewater Clarifier. The requested modifications are summarized below.

- Collect soil samples from approximately 3½ feet below ground surface at locations 6, 7, and 8 as shown on attached Figures 1, 2, and 3.
- Collect a soil sample from approximately 12½ feet below ground surface at location 8 as shown on attached Figures 1 and 3.
- Collect a soil sample from approximately 8 feet below ground surface at location 9 as shown in Figures 1, 2, and 3.

Mr. Kapoor
August 17, 2001
Page 2

Collect a soil sample from approximately 7 feet below the concrete surface at location 5 as shown in Figures 1 and 2.


Delete the sample location at the bottom of the clarifier.

We concur with the requested modifications and approve the amendment to the Closure Plan, Contingent Closure Plan, and Post-Closure Plan effective August 20, 2001. Please use this letter and attached figures as an addendum to the closure plan.

If you should have any questions concerning this matter, please contact Mark A. Campbell, Environmental Engineer Senior, of my staff at (804) 698-4125 or macampbell@deq.state.va.us.

Very truly yours,



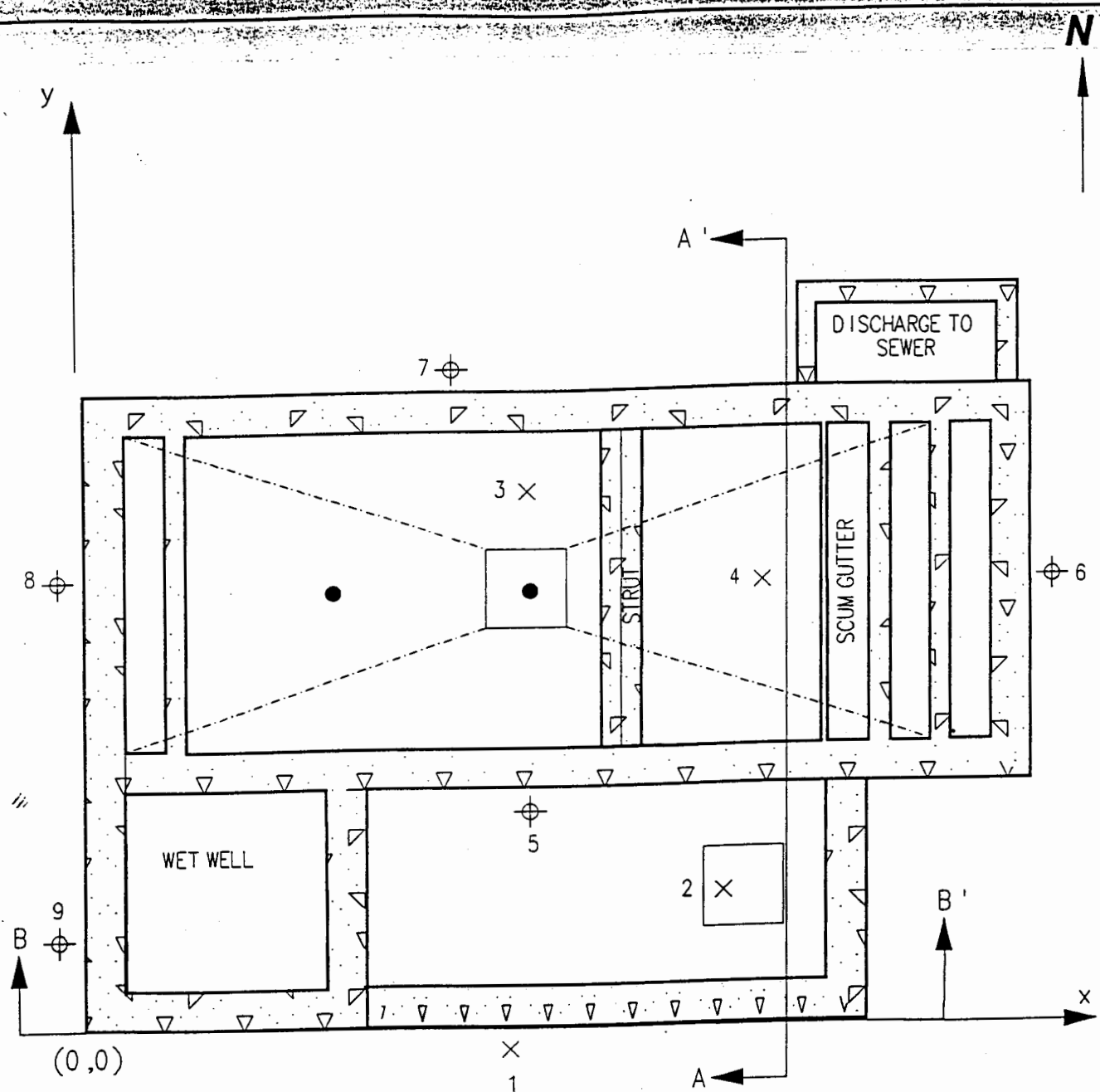
 Dennis H. Treacy

enclosure

c: Christian Braun, OWP (w/out enclosure)
John Bowden, NVRO (w/enclosure)
Debra Miller, OWP (w/out enclosure)
Mark Campbell, OWP (w/enclosure)
Arthur Kapell, OWP (w/out enclosure)
Joanne Cassidy, EPA Region 3 (3WC21) (w/enclosure)

Charles Kirk, AAS Environmental (w/out enclosure)
8501 Silverbrook Road
Lorton, Virginia 22079

WP2001, No. 393



Sample location coordinates measured in feet from origin "0,0".
 Z direction measured in feet down from top edge of concrete.

- ⊕ Proposed Soil Sample Location
- × Successful Soil Sample Location
- Attempted Soil Sample Location

Scale 1" : 4'

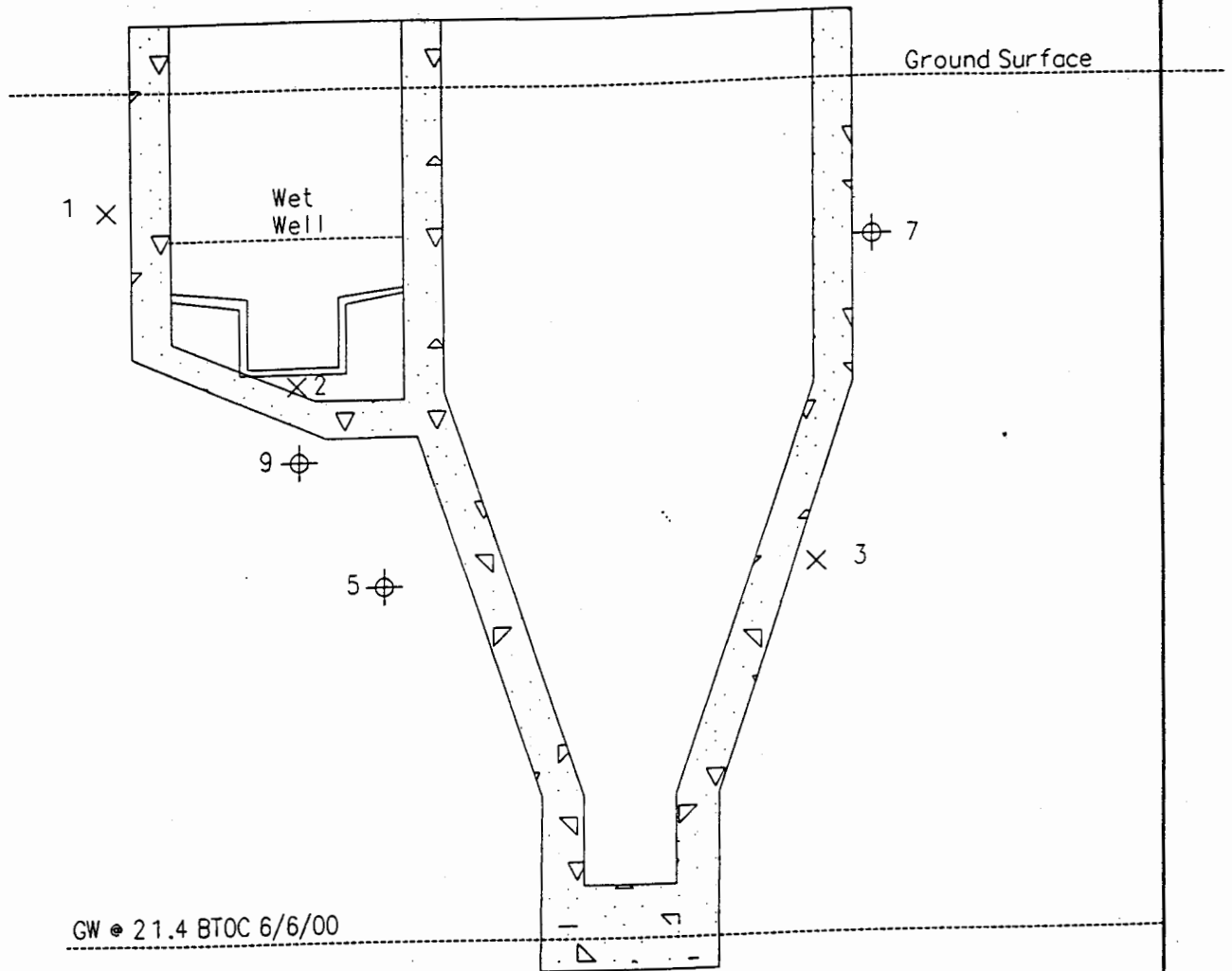
LORTON CORRECTIONAL FACILITIES - LORTON, VA
 Wastewater Clarifier Top View

Project Code: E-2937

Figure # 1



AAS Environmental, Inc.
 10000 W. 10th Ave. Suite 100
 Denver, CO 80202



GW @ 21.4 BTOC 6/6/00

GW @ 22.2' BTOC 11/30/00

BTOC: Below Top of Casing .

GW @ 28.54 BTOC 3/14/01

- ⊕ Proposed Soil Sample Location
- X Successful Soil Sample Location

Scale 1" : 4'

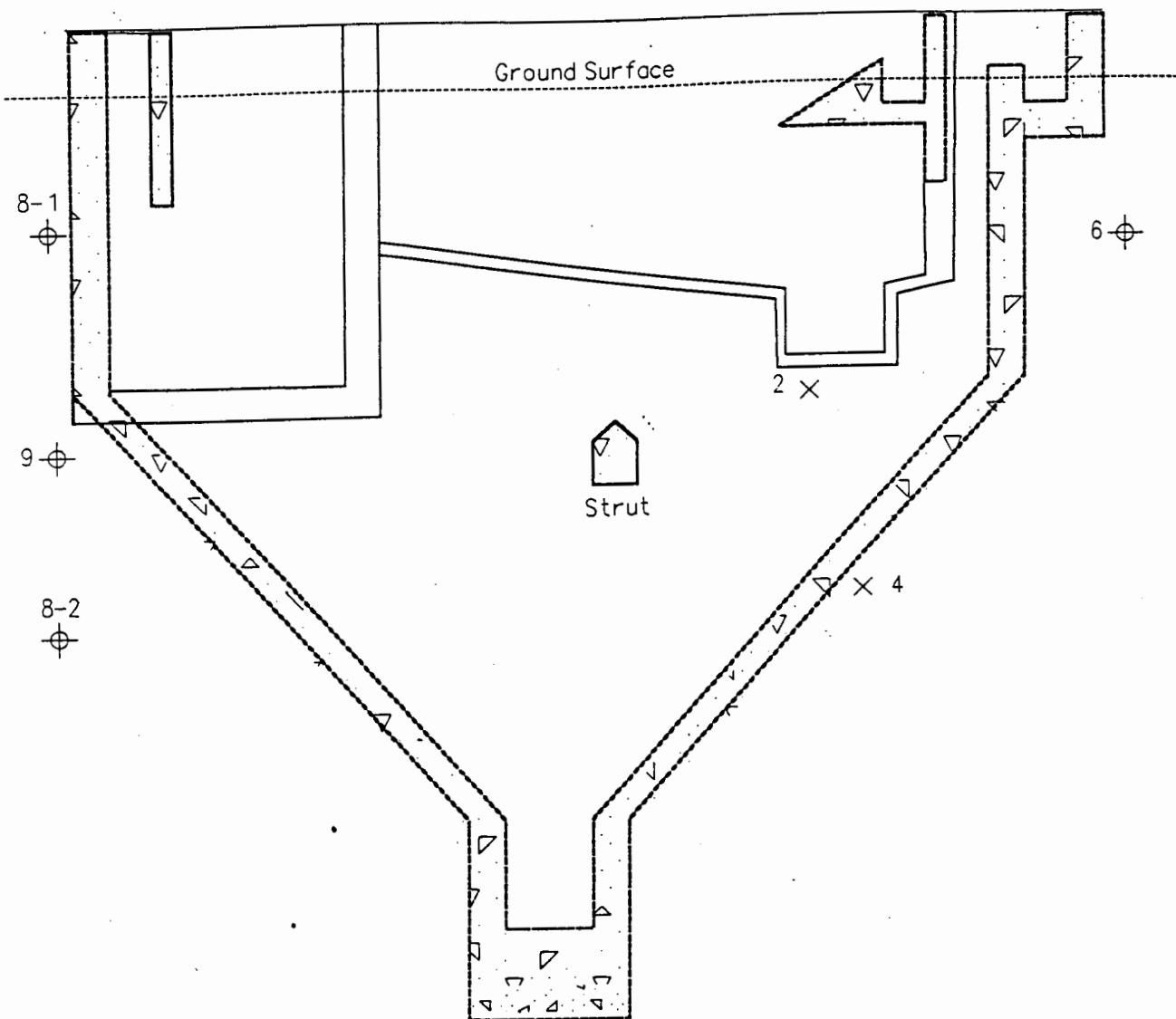
LORTON CORRECTIONAL FACILITIES - LORTON, VA
Wastewater Clarifier Side View (Facing West)
Section A-A'

Project Code: E-2937

Figure # 2



AAS Environmental, Inc.
2701 W. 11th St. Suite 201
Tomball, TX 77375



⊕ Proposed Soil Sample Location
 X Successful Soil Sample Location

Scale 1" : 4'

LORTON CORRECTIONAL FACILITIES - LORTON, VA
 Wastewater Clarifier Side View (Facing North)
 Section B-B'

Project Code: E-2937

Figure # 3



AAS Environmental, Inc.
 Environmental Engineering & Construction



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

James S. Gilmore, III
Governor

John Paul Woodley, Jr.
Secretary of Natural Resources

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Dennis H. Treacy
Director

Gregory L. Clayton
Regional Director

November 9, 2001

Mr. John Henley
DC Department of Corrections
c/o Mr. Scott Heiser
AASE
8501 Silverbrook Road
Lorton, VA 22079

Re: RCRA Inspection
DC Department of Corrections (DCDC) VAD980830988

Dear Mr. Henley:

The Virginia Department of Environmental Quality, Northern Virginia Regional Office (NVRO), conducted a compliance evaluation inspection at DCDC on October 22, 2001. NVRO evaluated the facility for compliance with the Virginia Hazardous Waste Management Regulations (VHWMR) as a large quantity generator. I have enclosed a survey sheet and five inspection checklists for your review.

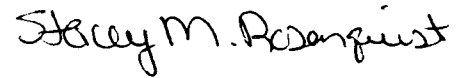
Based on review of observations, responses, and documents obtained during and after the inspection, it appears that the facility is in compliance with the VHWMR.

Past activities at DCDC resulted in the storage of hazardous waste for greater than 90 days in the ink pit (surface impoundment). The closure of the ink pit is included in DCDC's Order, effective July 8, 1999. Currently, DCDC is pursuing closure activities of the ink pit in accordance with the Order.

Mr. Henley
DCDC
Page 2

If you have any questions, please call me at (703) 583-3891.

Sincerely,

A handwritten signature in black ink that reads "Stacey M. Rosenquist". The signature is written in a cursive, flowing style.

Stacey M. Rosenquist
Environmental Specialist II

Enclosures

cc: Christian Braun
Allen Brockman
Anne Crosier
Jon Terry
Scott Heiser, AASE

**DEPARTMENT OF ENVIRONMENTAL QUALITY
WASTE DIVISION
SURVEY SHEET**

NAME OF FACILITY : DC Department of Corrections

ADDRESS : Silverbrook Road, Lorton, VA 22079

EPA I.D.NUMBER : VAD980830988

FACILITY REPRESENTATIVE : Jason Gauthier and Scott Heiser

TELEPHONE NUMBER : 703-493-9577/9588

INSPECTOR : Stacey M. Rosenquist

DATE OF INSPECTION : October 22, 2001

-
1. WHAT IS THE BUSINESS ACTIVITY OF THE FIRM? (I.E., FURNITURE MANUFACTURING, METAL PLATING, RECYCLING, ETC.)
- DCDC Industries had a furniture repair and refinishing operation, auto body shop, and print shop. DCDC has shut down Industries' operations and is preparing for the December 2001 closing.

-
2. GIVE A BRIEF DESCRIPTION OF THE WASTE STREAM(S) (BY CHEMICAL NAME, IF POSSIBLE) AND HAZARDOUS WASTE CODE(S) GENERATED BY THE FIRM.

INDUSTRIES

Furniture (ceased operations in July 2001)

F002/F003 – waste paint related material - methylene chloride (stripper sludge)
F002 – hazardous waste solid (sponges/rags/PPE)
D001/D035/F005 – waste paint (paint/thinner)
D035/F005 – hazardous waste solid (paint filters)

Metal Shop (ceased operations in September 2001)

D001/D018/F003/F005 – waste flammable liquids (paint/thinner)
D001/D018/F003/F005 – waste flammable liquids (paint rags)
Various characteristic and listed hazardous waste generated as a result of closing Industries.

Print Shop (ceased operations in September 2001)

Various characteristic wastes generated as a result of closing Industries. According to facility personnel, this operation did not generate any hazardous waste while in operation.

VEHICLE MAINTENANCE DIVISION

Body Shop

DCDC did not ship off-site any hazardous waste from the body shop.
Waste paint - The body shop generated some waste paint.
Waste paint filters - DCDC has identified the paint filters as a possible hazardous waste. DCDC has indicated that they will test the filters to determine if they meet the definition of a hazardous waste. At the time of the inspection, the paint filters had not been removed from the paint booth.

FACILITY MAINTENANCE

Various characteristic and listed hazardous waste generated as a result of housekeeping efforts.

-
3. LIST (A) THE NOMINAL AMOUNTS OF HAZARDOUS WASTE GENERATED IN ANY MONTH, AND (B) THE GREATEST AMOUNTS OF ALL WASTES EVER ACCUMULATED/GENERATED AT THE SITE, IF APPLICABLE TO GENERATOR CATEGORY DETERMINATION (E.G. IF A CESQG, HAVE THEY EVER EXCEEDED 1000 KG ACCUMULATION, OR IF A SQG HAVE THEY EVER EXCEEDED 1000 KG/MO GENERATION FOR ALL WASTE STREAMS AGGREGATE).

A) WASTE CODES

AMOUNT GENERATED

Varies

Varies

B) MAXIMUM WASTE GENERATION AND/OR ACCUMULATION (List quantities, types, and relevant dates):

Varies

-
4. FOR THE EVALUATION PERIOD COVERED BY THIS INSPECTION:

- A) HAS THE FACILITY GENERATED >1 KG/MO OF *ACUTE* HAZARDOUS WASTE (P-LIST) YES NO
- B) HAS THE FACILITY GENERATED >100 KG OF *ACUTE* HAZARDOUS WASTE FROM SPILL CLEAN-UP RESIDUE? YES NO
- C) HAS THE FACILITY ACCUMULATED HAZARDOUS WASTE IN EXCESS OF TIME AND QUANTITY LIMITS ESTABLISHED FOR THEIR GENERATOR CLASS? YES NO
[NOTE: A CESQG may not accumulate more than 1000 kg, a SQG may not accumulate more than 6000 kg or accumulate more than 180 days (or 270 days), and a LQG may not accumulate more than 90 days.]
- D) HAS THE FACILITY *EPISODICALLY* GENERATED HAZARDOUS WASTE IN EXCESS OF THEIR NORMAL GENERATOR CATEGORY? YES NO
[NOTE: Applicable generator category requirements apply during the period of generation and for as long as the waste remains on-site.]

PROVIDE COMMENTS IN QUESTION 10 EVALUATION CATEGORY ASSIGNMENT.

-
5. HOW IS THE WASTE PRESENTLY BEING HANDLED? WHERE IS IT SENT? (List all transporters and facilities, or on-site treatment performed.)

TRANSPORTERS / TSD FACILITIES

EPA ID NUMBERS

ON-SITE TREATMENT

Trans. Clean Venture, Inc.

NJ0000027193

TSD Cycle Chem, Inc.

PAD067098822

N/A

TSD Ashland Distribution Co.

NCD061263315

-
6. DOES THE FACILITY GENERATE ANY HAZARDOUS WASTE THAT IS EXCLUDED FROM REGULATION? (e.g., reclaimed on-site, used as a substitute for a CCP, de-characterized by treatment, etc.) IF YES, LIST THE WASTE AND THE BASIS FOR THE EXCLUSION. YES NO
-

7. USED OIL MANAGEMENT:

A) DOES THE FACILITY GENERATE USED OIL? YES NO
ON SPECIFICATION
ONLY _____
ON-SPEC/OFF-SPEC

B) DOES THE FACILITY TRANSPORT USED OIL? (notification required) YES NO

C) DOES THE FACILITY MARKET OR BURN *OFF-SPEC* USED OIL? YES NO

D) DOES THE FACILITY BURN USED OIL IN AN ON-SITE SPACE HEATER? YES NO
(If YES verify compliance requirements and comment)

E) DOES THE FACILITY MIX HAZARDOUS WASTE WITH USED OIL? YES NO

IF YES, IS THIS ON-SITE CESQG HAZARDOUS WASTE? YES NO

IS THIS IGNITABLE ONLY HAZARDOUS WASTE? YES NO

[FOR ANY MIXING, PROVIDE COMMENTS AND EVALUATE FOR PART 279 COMPLIANCE]

F) DOES THE FACILITY ENSURE DELIVERY OF USED OIL TO A LEGITIMATE USED OIL RECLAIMER? YES NO
DCDC does not generate any used oil.

G) USED OIL FILTERS:

DOES THE FACILITY MANAGE USED OIL FILTERS? YES NO

DOES THE GENERATOR MANAGE THESE UNDER THE FILTER EXCLUSION LANGUAGE OF PART 261.4(b)(13)? YES NO

ARE THE FILTERS MANAGED IN SUCH A MANNER TO MEET THE CONDITIONS OF THE EXCLUSION? YES NO

SPECIFY MANAGEMENT METHOD(S):

8. DOES THE FACILITY GENERATE ANY HAZARDOUS WASTE THAT IS YES NO
RECLAIMED TO RECOVER ECONOMICALLY FEASIBLE AMOUNTS OF
GOLD, SILVER, PLATINUM, PALLADIUM, IRIIDIUM, OSMIUM, RHODIUM,
RUTHENIUM, OR ANY COMBINATION OF THESE?

IF YES, LIST THE WASTE AND WHERE IT IS SENT. VERIFY COMPLIANCE WITH PART 266
SUBPART F AND PROVIDE COMMENTS:

9. DOES THE FACILITY MANAGE SPENT LEAD-ACID BATTERIES? YES NO

IF YES, INDICATE ALL THAT ARE APPLICABLE: GENERATE _____
TRANSPORT _____
STORE _____
COLLECT _____
RECLAIM _____

FACILITIES STORING AND RECLAIMING ON-SITE ARE SUBJECT TO PART B REQUIREMENTS
SPECIFY MANAGEMENT METHOD(S):

10. BASED ON THE ABOVE PRELIMINARY INFORMATION THE FACILITY IS CONSIDERED
TO BE ACTING AS, AND IS BEING EVALUATED FOR THIS INSPECTION AS, A: (Indicate all
that are applicable.)

- _____ A. CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR (CESQG)
_____ B. SMALL QUANTITY GENERATOR (SQG)
X C. GENERATOR (LQG)
_____ D. PERMITTED OR INTERIM STATUS TSDF
X E. UNPERMITTED TSDF (Please explain in COMMENTS section below)
_____ F. TRANSPORTER
_____ G. OTHER: (Please explain in COMMENTS section below)

IF EPISODIC GENERATION HAS OCCURRED, YOU WILL NEED TO ASSIGN AN APPROPRIATE
GENERATOR STATUS FOR THIS EVALUATION AND ASSESS COMPLIANCE DURING/FOR THE
EPOSODIC PERIOD.

COMMENTS

Past activities at DCDC resulted in the storage of hazardous waste for greater than 90 days in the ink
pit (surface impoundment). The closure of the ink pit is included in DCDC's Order, effective July 8,
1999.

11. LIST EACH CONTAINER AND TANK ACCUMULATION AREA. SPECIFY THE NUMBER AND CAPACITY OF EACH TANK AND CONTAINER TYPE. [NOTE: INCLUDE ANY SATELLITE ACCUMULATION AREAS AND VERIFY COMPLIANCE WITH SATELLITE ACCUMULATION REQUIREMENTS; IF NON-COMPLIANT, PROVIDE COMMENTS]:

<u>LOCATION</u>	<u>NUMBER / SIZE OF CONTAINERS</u>	<u>NUMBER / SIZE OF TANKS</u>
-----------------	------------------------------------	-------------------------------

Satellite Area – Body Shop (waste paint/thinner and paper)	2 / 55 gallons each	
---	---------------------	--

Storage Area – Facilities Management Complex	2 / 55 gallons each	
--	---------------------	--

12. OVERALL INSPECTION COMMENTS:

DCDC is pursuing closure activities of the ink pit in accordance with their approved closure plan and groundwater monitoring plan.

DCDC has shut down Industries' operations and is preparing for the December 2001 closing.

13. WASTE MANAGEMENT FLOW DIAGRAM:

[Sketch a brief, but detailed, flow diagram that includes waste generation processes, treatment processes, the steps through accumulation/storage and off-site management, including satellite accumulation. Consider all waste streams, including any excluded hazardous waste. Include any wastewater treatment units or facilities that may receive either on-site or hard piped hazardous waste, and verify permits under the Clean Water Act.]

This section is optional, but should be viewed as critical to understanding complex processes, treatments, waste characterization issues, applicable exemptions, and is REQUIRED to support actions that may result in enforcement.

N/A

5. GENERATORS CHECKLIST

NA = Not Applicable, NC = Non-Compliance

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	SECTION A – MANIFEST				
262.20	1. Does generator ship waste off-site?	X			
262.20 (a)	2. Does generator use manifest?	X			
262.20(e)	a. If no, is generator a small quantity generator (generating between 100 and 1000 kg/month?) NOTE: SQGs are only exempt if wastes are reclaimed. (See §262.20(e).)			X	
	1. If yes, does generator indicate this when sending waste to a TSD facility?			X	
Part 262 Appendix	b. If yes, does manifest include the following information?				
	1. Manifest document no.	X			
	2. Generator's name, mailing address, telephone no.	X			
	3. Generator EPA I.D. no.	X			
	4. Transporter Name(s) and EPA I.D. no.(s)	X			
	5. Facility name, address, and EPA I.D. no.	X			
	6. Alternate facility name, address, and EPA I.D. no.	X			
	7. Instructions to return to generator if undeliverable	X			
	8. Waste information required by DOT – shipping name, quantity (weight or vol.), containers (type and number)	X			
	9. Emergency information (optional) (special handling instructions, telephone no.)	X			
	10. Is the following certification on each manifest form? "This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the applicable national and international regulations."	X			
262.40(a)	11. Does generator retain copies of manifests? If yes, complete a through g. (§262.23)	X			
262.23(a)(1)	a. Did generator sign and date all manifests?	X			
262.23(a)(2)	b. Did generator obtain handwritten signature and date of acceptance from initial transporter?	X			

40 CFR CITATION	REGULATION	YES	NO	NA	NC
262.23(a)(3), 262.40(a)	c. Does generator retain one copy of manifest signed by generator and initial transporter?	X			
262.40(a)	d. Do returned copies of manifest include facility owner/operator signature and date of acceptance?	X			
262.42(a)(2)	12. Have manifests been received from the TSD facility for any waste, which was shipped over 45 days ago?	X			
	a. If no, has the generator filed an exception report?			X	
	b. Does the exception report include:				
	1. a legible copy of the manifest for which the generator does not have confirmation of the delivery? and			X	
	2. a cover letter explaining the efforts taken to locate the shipment?			X	
	SECTION B – HAZARDOUS WASTE DETERMINATION				
262.11(b)	3. Does generator generate solid waste(s) listed in Subpart D (List of Hazardous Waste)?	X			
262.11(c)	4. Does generator generate solid waste(s) listed in Subpart C that exhibit hazardous characteristics (corrosivity, ignitability, reactivity, TC)?	X			
	a. Does generator determine characteristics by testing or by applying knowledge of processes?	X			
	1. If determined by testing, did generator use test methods in Part 261, Subpart C (or equivalent)?	X			
262.11	5. Has the generator evaluated all solid wastes to determine whether the solid wastes are hazardous wastes?	X			
	SECTION C – PRETRANSPORT REQUIREMENTS				
262.30	6. Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT requirements)?	X			
	a. Are containers to be shipped leaking or corroding? SEE COMMENTS			X	
	b. Complete Checklist 4. Containers to evaluate condition of containers.				
	c. Is there evidence of heat generation from incompatible wastes in the containers?			X	

40 CFR CITATION	REGULATION	YES	NO	NA	NC
262.31	7. Does generator follow DOT labeling requirements in accordance with 49 CFR 172? SEE COMMENTS	X			
262.32	8. Does generator mark each package in accordance with 49 CFR 172? SEE COMMENTS	X			
262.32	9. Is each container of 110 gallons or less marked with the following label? SEE COMMENTS HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.	X			
	a. Generator name(s) and address(es)	X			
	b. Manifest document No.	X			
262.33	10. Does generator have placards to offer to transporters? SEE COMMENTS		X		
262.34	11. Accumulation time				
262.34(a)(1)	a. Are containers used to temporarily store waste before transport?	X			
262.34(a)(2)	1. If yes, is each container clearly dated.				
262.34(a)(3)	2. If yes, is each container labeled or clearly marked with the words "Hazardous Waste?"				
262.34(c)(1)	12. Does the generator have satellite accumulation areas where up to 55 gallons of any one type of hazardous waste (HW) (1qt acutely HW) are accumulated? If yes,		X		
262.34(c)(1)(ii)	a. Are the containers marked with the words "Hazardous Waste" or other words that identify the contents of the container?			X	
262.34(c)(2)	13. Are amounts in excess of those allowed being accumulated in the satellite accumulation area? If yes,			X	
	a. Has the generator marked the excess amount with the date the excess amount began accumulating? and			X	
	b. Has the generator either removed the excess amount within three days of the date of excess accumulation or has the generator complied with all other provisions for accumulation areas. Namely, has the generator notified the Executive Director about the location of the accumulation area?			X	
	SECTION D – RECORDKEEPING AND RECORDS				
262.40	14. Does generator keep the following reports for 3 years?				
	a. Manifest or signed copies from designated facilities	X			
	b. Biennial reports	X			
	c. Exception reports			X	
	d. Test results	X			
	15. Where are the records kept (at facility or elsewhere)?				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
SECTION E – SPECIAL CONDITIONS					
	16. Has the primary exporter received from or transported to a foreign source any hazardous waste?			X	
262.53	a. If yes, has he filed a notice with the Regional Administrator?			X	
262.54	b. Is this waste manifested and signed by a foreign consignee?			X	
262.54	c. If generator transported wastes out of the country, has he received confirmation of delivered shipment?			X	
SECTION F – LDR REQUIREMENTS					
PART 268	17. Does the facility generate, transport, treat, store or dispose any land-restricted wastes?	X			
268.1(c)	18. Is land disposal of wastes occurring? If yes,		X		
267.1(c)(1)	a. Has the facility been granted an extension to the effective date for land restriction applicable to its restricted waste? OR			X	
267.1(c)(2)	b. Has the facility been granted an exemption from prohibition pursuant to a petition for those land-restricted wastes and units covered by the petition? OR			X	
267.1(c)(3)	c. Are the wastes hazardous only because they exhibit a hazardous characteristic and are they disposed outside the Commonwealth into an injection well without exhibiting any prohibited characteristic of hazardous waste at the point of injection?			X	
268.5	19. Has the owner/operator submitted an application for case-by-case extension to the effective date of any applicable restriction?		X		
268.6(a)	20. Has the owner/operator been granted a petition seeking an exemption from a prohibition for the disposal of hazardous waste in a particular unit or units?		X		
268.3(a)	21. Are facility representatives diluting the restricted waste or residual from treatment of the restricted waste as a substitute for adequate treatment, to circumvent the effective date of prohibition, to otherwise avoid a prohibition, or to circumvent a land disposal prohibition?		X		
268.4(a)	22. Is the facility treating land-restricted wastes in a surface impoundment or series of surface impoundments? (Note: Evaporation of hazardous constituents in a surface impoundment as the principal means of treatment is not considered to be an acceptable form of treatment for land restricted wastes.)		X		
	23. If yes, complete Check Sheet 12. Surface Impoundments.				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
268.7(a)(5)	24. Is the facility treating waste in tanks or containers in order to meet applicable treatment standards under 268.40?		X		
268.7(a)(5)	a. If yes, has the facility developed a Waste Analysis Plan?			X	
268.7(a)(1), 268.7(a)(2)	25. For restricted wastes, which the generator is managing, for which he has not met the applicable treatment standards, has the generator accompanied each shipment of waste with a notification to the treatment facility of the appropriate treatment standards and any applicable prohibitions?	X			
268.7(a)(2), Table 268.7(a)(4)	26. Did the notification include the following information:				
	a. EPA Hazardous Waste Number?	X			
	b. The waste constituents that the treater will monitor, if monitoring will not include all regulated constituents?	X			
	c. The manifest number associated with the shipment of waste? and	X			
	d. Waste analysis data, where available?	X			
268.7(a)(3)	27. For restricted wastes which the generator has determined can be land disposed without further treatment, has the generator accompanied each shipment of waste with a notification and certification to the land disposal facility that the waste meets the applicable treatment standards set forth in subpart D of this part and the applicable prohibitions set forth in 268.32 or RCRA section 3004(d)?			X	
268.7(a)(3)(i), Table 268.7(a)(4)	28. Did the notification include the following information:				
	a. EPA Hazardous Waste Number?			X	
	b. The waste constituents that the treater will monitor, if monitoring will not include all regulated constituents?			X	
	c. The manifest number associated with the shipment of waste? And			X	
	d. Waste analysis date, where available?			X	
268.7(a)(3)(i)	29. Was the certification signed by an authorized representative, and did it state the following: I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR part 268 subpart D. I believe that the information I submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.			X	

40 CFR CITATION	REGULATION	YES	NO	NA	NC
268.7(a)(4)	30. Has the generator received a case-by-case exemption on restricted waste, been granted an exemption through petition, or those wastes subject to a national variance, has the generator forwarded notice with the waste to the land disposal facility stating that the waste is exempt from the land disposal restrictions?		X		
268.7(a)(8)	31. Does the generator retain on-site copies of all notices, certifications, demonstrations, waste analysis data, and other documentation for at least five years from the date the waste was last sent to on-site or off-site treatment, storage or disposal?	X			
268.50	32. Is the generator storing land-restricted waste? (For one year storage only)		X		
268.50(a)(1)	33. If yes, is the storage on-site solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment or disposal?			X	

COMMENTS:

In accordance with 9 VAC 20-60-262 B.4, please note that DCDC must notify the Department of the exact location of the accumulation/storage areas (note: satellite accumulation areas are excluded) at least 15 days prior to the establishment of the area.

5. DCDC has identified the paint filters from the auto body shop as a possible hazardous waste. DCDC has indicated that they will test the filters to determine if they meet the definition of a hazardous waste when they are removed from the paint booth. DCDC has a Hazardous Waste Determination Plan.

6. At the time of the inspection, DCDC was neither accumulating nor storing hazardous waste in the Facilities Management Complex Shed.

7. - 9. DOT labels are placed on containers prior to shipment.

10. The hazardous waste transporter provides the placards.

11. DCDC uses containers to temporarily store waste before transport; however, at the time of the inspection, DCDC was neither accumulating nor storing hazardous waste in the Facilities Management Complex Shed.

4. CONTAINERS CHECKLIST

NA = Not Applicable, NC = Non-Compliance

40 CFR CITATATION	REGULATION	YES	NO	NA	NC
	SECTION A – USE AND MANAGEMENT				
264/265.171	1. Are containers in good condition?			X	
	SECTION B – COMPATIBILITY OF WASTE WITH CONTAINER				
264/265.172	2. Is container made of a material that will not react with the waste which it stores?			X	
	SECTION C – MANAGEMENT OF CONTAINERS				
264/265.173(a)	3. Is container always closed while holding hazardous waste?			X	
264/265.173(b)	4. Is container not opened, handled, or stored in a manner, which may rupture it or cause it to leak?			X	
	SECTION D – INSPECTIONS				
264/265.174	5. Does owner/operator inspect containers at least weekly for leaks and deterioration?	X			
	SECTION E – IGNITABLE AND REACTIVE WASTES				
264/265.176	6. Are containers holding ignitable and reactive waste located at least 15 m (50 ft) from facility property lines?	X			
	PERMITTED FACILITIES ONLY				
	SECTION F – INCOMPATIBLE WASTE				
264/265.177(a)	7. Are incompatible wastes or materials placed in the same containers?			X	
264/265.177(b)	8. Are hazardous wastes placed in washed, clean containers when they previously held incompatible waste?			X	
264/265.177(c)	9. Are incompatible hazardous wastes separated from each other by a berm, dike, wall, or other device?			X	
	SECTION G – CLOSURE				
	10. Do container storage areas have a containment system?			X	
264/265.178	11. At closure, were all hazardous wastes and associated residues removed from the containment system?			X	

COMMENTS:

DCDC has one <90-day area, the Facilities Management Complex Shed. At the time of the inspection, DCDC was neither accumulating nor storing hazardous waste in the Facilities Management Complex Shed.

7. HEALTH & SAFETY CHECKLIST

NA = Not Applicable, NC = Non-Compliance

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	SECTION A - OUTLINE OF PERSONNEL TRAINING PROGRAM				
264/265.16(d)(3)	1. Does the facility have a written training program?	X			
264/265.16(a)(1)	2. Does the program consist of:				
	a. strictly classroom instruction?		X		
	b. strictly on-the-job training?		X		
	c. classroom instruction AND on-the-job training?	X			
264/265.16(c)	3. Is an annual refresher course required for personnel whose positions at the facility are related to hazardous waste management? SEE COMMENTS	X			
	SECTION B - JOB TITLE/JOB DESCRIPTION				
264/265.16(d)(1)	4. Is a job title provided for each employee whose position at the facility is related to hazardous waste management?	X			
264/265.16(d)(2)	5. Is a job description provided for each employee whose position at the facility is related to hazardous waste management?	X			
	SECTION C - TRAINING DIRECTOR				
264/265.16(a)(2)	6. Is the training program directed by a person trained in hazardous waste management?	X			
	SECTION D - RELEVANCE OF TRAINING TO JOB POSITION				
264/265.16(a)(2)	7. Are facility personnel instructed in hazardous waste management procedures (including contingency plan implementation) relevant to their positions?	X			
	SECTION E - TRAINING AND EMERGENCY RESPONSE				
264/265.16(a)(3)	8. Does the training program include the following emergency response procedures where applicable ?				
	a. Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment?	X			
	b. Key parameters for automatic waste feed cut-off systems?			X	
	c. Procedures for utilizing communications or alarm systems?	X			
	d. Directions for responding to fires or explosions?	X			
	e. Procedures for groundwater contamination response?			X	
	f. Procedures for conducting shutdown operations?			X	
	SECTION F - IMPLEMENTATION OF TRAINING PROGRAM				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
264/265.16(b)	9. Are all facility personnel trained within six months of their employment or assignment to the facility or transfer to a new position?	X			
264/265.16(b)	10. Are facility personnel allowed to work unsupervised before their training program has been completed?		X		
264/265.16(d)4 and (e)	11. Are records maintained which document that the required training has been given to and completed by facility personnel?	X			
	SECTION G - TESTING AND MAINTENANCE OF EQUIPMENT				
264/265.33	12. Does the owner/operator test and maintain (as necessary to assure its proper operation in time of emergency) the following equipment:				
	a. All communications or alarm systems?	X			
	b. Fire protection equipment?	X			
	c. Spill control equipment?	X			
	d. Decontamination equipment?	X			
	SECTION H - GENERAL INSPECTION REQUIREMENTS (PERMITTED FACILITIES ONLY)				
264/265.15(b)(1)	13. Does the owner/operator maintain a written schedule at the facility for the inspection of:				
	a. Monitoring equipment?			X	
	b. Safety and emergency equipment?			X	
	c. Security devices?			X	
	d. Operating and structural equipment?			X	
	e. Types of problems with equipment:				
	1. Malfunction			X	
	2. Operator error			X	
	3. Discharges			X	
264/265.15(b)(3)	14. Does the schedule identify the types of problems to look for?			X	
264/265.15(b)(4)	15. Is the frequency of inspection based on the possible deterioration of equipment and the probability of incident?			X	
264/265.15(b)(4)	16. Are areas subject to spills, such as loading and unloading areas, inspected daily?			X	
264/265.15(d)	17. Does the owner/operator maintain an inspection log? If yes, does the log include:			X	
	a. Date and time of inspection?			X	
	b. Name of inspector?			X	
	c. Notations of observations?			X	
	d. Date and nature of repairs or remedial actions?			X	
	18. Have any malfunctions or other problems not been remedied? (Summarize in comments section.)			X	
	SECTION I - REQUIRED AISLE SPACE				
264/265.35	19. Does the facility maintain aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment?	X			

40 CFR CITATION	REGULATION	YES	NO	NA	NC
264/265.35	20. If aisle space is not maintained, has the owner/operator demonstrated to the Regional Administrator that the space is not needed?			X	
264/265.32	SECTION J – EQUIPMENT REQUIREMENTS				
	21. Is there evidence of fire, explosion, or contamination of the environment? If yes, explain in the comment section.		X		
	22. Is the facility equipped with the following:				
264/265.32(a)	a. An internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel?	X			
264/265.32(b)	b. A device such as a telephone (immediately available) or handheld two-way radio capable of summoning emergency assistance from police, fire, or state or local emergency response teams?	X			
264/265.32(c)	c. Portable fire extinguishers?	X			
264/265.32(c)	d. Fire control equipment (including special extinguishing equipment such as foam, inert gas, or dry chemical)?	X			
264/265.32(c)	e. Spill control equipment?	X			
264/265.32(c)	f. Decontamination equipment?	X			
264/265.32(d)	g. Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems?	X			
	SECTION K – REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTES (PERMITTED FACILITIES ONLY)				
264/265.17(a)	23. Does the facility handle ignitable or reactive waste? If yes:			X	
	a. Does the owner/operator take the following precautions to prevent accidental ignition or reaction of wastes: Separate and protect ignitable or reactive wastes from sources of ignition or reaction (open flames, smoking, cutting, welding, hot surfaces, frictional heat, static electrical or mechanical sparks, spontaneous ignition, and radiant heat?			X	
264/265.17(a)	24. Does the owner/operator confine smoking and open flames to specially designated locations, while ignitable or reactive waste is being handled?			X	
264/265.17(a)	25. Are "No Smoking" signs placed conspicuously wherever there is a hazard from ignitable or reactive waste?			X	
264/265.17(a)	26. Does the owner/operator have procedures in place to prevent accidental ignition or reaction of wastes?			X	
264/265.50 through §265.56	SECTION L – CONTINGENCY PLAN				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
264/265.51(a)	27. Does the owner/operator have a Contingency Plan, or a Spill Prevention Control and Counter measures (SPCC) Plan, or some other emergency plan, that is amended for hazardous waste management?	X			
264/265.53(a)	28. Is a copy maintained at the facility?	X			
264/265.53(b)	29. Has a copy been submitted to all local police and fire departments, hospitals, and State and local emergency response teams?	X			
264/265.52(a)	30. Does the plan describe the control procedures taken in the event of a fire, explosion, or release?	X			
	31. Does the plan describe how and when it will be implemented?	X			
264/265.52(c)	32. Does the plan describe arrangements agreed to by local police and fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services?	X			
264/265.52(d)	33. Does the plan list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	X			
264/265.52(d)	34. Is one person named as the primary coordinator?	X			
264/265.55	35. Does the coordinator have the authority to commit the resources to carry out the emergency plan?	X			
264/265.52(e)	36. Does the plan physically describe and identify the location of all emergency equipment at the facility?	X			
	37. Does the plan include provisions to ensure that the equipment is cleaned and fit for its intended use before operations are resumed?	X			
264/265.52(f)	38. Does the plan include an evacuation plan for facility personnel?	X			
264/265.52(f)	39. Does the plan describe:				
	a. Signal(s) to be used to begin evacuation?	X			
	b. Evacuation routes?	X			
264/265.56(a)	c. Does the plan describe the methodology for immediate notification of:				
	1. Facility personnel?	X			
	2. State or local agencies with designated response roles?	X			
264/265.56(b)	40. Does the plan include procedures for identification of released materials?	X			
264/265.56(c)	41. Does the plan include procedures/criteria to assess possible hazards to human health and the environment that may result from the release, fire, or explosion?	X			
264/265.56(e)	42. Does the plan describe all reasonable measures necessary to ensure that fires, explosions, or releases do not occur, reoccur, or spread to other hazardous waste at the facility?	X			
264/265.56(f)	43. Does the plan describe procedures to monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment if the facility stops operation in response to a fire, explosion, or release?			X	

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	SECTION M - NECESSARY AGREEMENTS WITH LOCAL AUTHORITIES				
264/265.37(a)	44. Has the owner/operator made the following arrangements:				
	a. Familiarized police, fire departments, and emergency response teams with the layout of the facility and associated hazards?	X			
	b. Designated one police and fire department with primary emergency authority when more than one might respond?			X	
	c. Agreements with State emergency response teams, contracts, and equipment supplies?	X			
	d. Familiarized local hospitals with the properties of waste handled at the facility and the types of injuries or illness that could result?	X			
264/265.37(b)	45. Where authorities decline to enter into such arrangements, has the owner/operator documented the refusal?			X	

COMMENTS:

DCDC has a contingency plan and training plan; however, the Furniture Shop ceased operations in July 2001 and the Metal Shop, the Print Shop and the Auto Body Shop in September 2001. Also, the prison is scheduled to close in December 2001.

3. Training was conducted for appropriate personnel in May 2001.

44. The contingency plan was provided to Central Facility Infirmary, DCDC Health and Safety Manager, DCDC Local Area Managers, Potomac Hospital, Fairfax County Fire Department, Fairfax County Police Department, Fairfax County Hazardous Materials Unit and VDEQ, NVRO.

17. RCRA WASTE MINIMIZATION CHECKLIST

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	SECTION A - STATUTORY/REGULATORY REQUIREMENTS				
262.20(a)	1. Has the manifest been certified by an authorized representative?	X			
262.20(a)	2. Has the waste minimization statement on the manifest been altered or deleted?		X		
262.20(a) 264/5.75	3. Does the facility have a written description of their waste minimization program? SEE COMMENTS			X	
	If a written description is not provided, can the facility personnel provide a verbal description of the waste minimization program?			X	
	4. Is there any visual evidence of the facility's waste minimization efforts? If yes, describe the activities/program observed in the comment section.			X	
	5. Does the description in the biennial report and/or annual export reports include:	SEE COMMENTS			
262.41(a)(6) 262.56(a)(5)(i) 264/265.75(h)	a. A description of the efforts undertaken during the year to reduce the volume and toxicity of waste generated?			X	
262.41(a)(7) 262.56(a)(5)(ii) 264/265.75(i)	b. A description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years?			X	
262.41(a)(8) 262.56(a)(6) 264/265.75(j)	c. Certification by the generator or authorized representative? (§262.56(a)(6) requires certification by primary exporter, §§264/5.75(j) requires certification by the owner/operator or authorized representative.)			X	
264.73(b)(9)	6. For permitted facilities, does the operating record contain a certification by permittee (at least annually) that the permittee has a program in place to reduce the volume and toxicity of the hazardous wastes?			X	
	SECTION B - PERMIT/ENFORCEMENT REQUIREMENTS				
	7. Does the facility's permit contain any waste minimization requirements? If yes, briefly describe in the comment section whether the requirements and indicate if they have been met.			X	
	SECTION C - PERMIT/REGULATORY REQUIREMENTS				
	8. Are there waste minimization requirements contained in enforcement orders or settlement agreements with the facility? If yes, briefly describe in the comment section whether the requirements and indicate if they have been met.			X	

COMMENTS:

3. & 4. The Furniture Shop ceased operations in July 2001 and the Metal Shop, the Print Shop and the Auto Body Shop in September 2001. Also, the prison is scheduled to close in December 2001. Currently, any hazardous waste generated by the facility is a result of housekeeping activities preparing for the December closing.

5. The facility was not required to file a biennial report for 2000. The 2001 biennial report is due by March 1, 2002.

SUBPART CC FACILITIES

40 CFR CITATION	REGULATION	YES	NO	NA	NC
SECTION A – GENERAL					
265.1080	1. If the facility claims that the subpart CC regulations are not applicable to their waste management unit(s) or that the unit(s) are exempt from regulation, explain the rational for the claim in the comments section.			X	
265.1083(c)(1)	2. If the waste management unit(s) are exempt because the volatile organic compound (VOC) concentration of the waste is <500 ppmw, does the facility have VOC determination records? (FACILITY MUST HAVE RECORDS)			X	
265.1084	3. Does the facility have a written sample and analysis plan for all waste characterization samples?			X	
265.1089	4. Does the facility have a written plan and schedule to perform air emission control equipment inspections and monitoring?			X	
265.1090(a)	5. Does the facility maintain inspection records on-site for at least three years from the date of the inspection?	X			
SECTION B – TANKS					
265.1085(c)	6. If a fixed roof tank (Tank Level 1 Controls) is used for the storage of a hazardous waste with >500ppmw VOC, is the maximum vapor pressure determination of the waste maintained in the facility records?			X	
265.1085(d)	7. Are all of the tanks for which there is no maximum vapor pressure determination one of the following: fixed roof with internal floating roof, external floating roof, fixed roof vented to a control device, pressure tank, or tank located within an enclosure vented to a control device (Tank Level 2 Controls)?			X	
265.1085(d)(5)	8. Are tank(s) used for waste stabilization located within an enclosure and vented to a combustion device?			X	
SECTION C – CONTAINERS					
265.1087(b)(1) 265.1087(c)(1)	9. Are the container(s) (>26 gallons) approved for hazardous waste storage by the U.S. Department of Transportation (DOT)?	X			
	a. If not DOT approved, and the container is <119 gallons, does the container when closed have no visible holes, gaps, or other open spaces into the interior of the container?			X	
	b. If not DOT approved, and the container is >119 gallons, is the container in light material service?			X	

	c.	If yes, does the container operate with no detectable organic emissions or has the container been demonstrated to be vapor-tight?	X			
265.1087(b)(2)	10.	Are any container(s) larger than 26 gallons used for waste stabilization?		X		
	a.	If yes, are the container(s) vented to control device or located within an enclosure vented to a control device?			X	
SECTION D – SURFACE IMPOUNDMENTS						
265.1086(b)	11.	Does the surface impoundment have either a floating membrane cover or a cover vented to a control device?			X	

COMMENTS:

5. & 9. DCDC has made no determination concerning VOC emissions from hazardous waste containers because the containers meet DOT standards. Inspection records for the <90-day area meet Subpart CC requirements.



COMMONWEALTH of VIRGINIA
DEPARTMENT OF ENVIRONMENTAL QUALITY

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John Paul Woodley, Jr.
Secretary of Natural Resources

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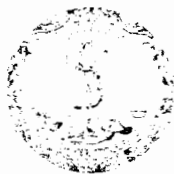
Dennis H. Treacy
Director

Gregory L. Clayton
Regional Director

MEMORANDUM

To: Christian Braun
From: Stacey M. Rosenquist *SMR*
Date: August 9, 2001
Subject: Site Visit – July 23, 2001
DC Department of Corrections (DCDC)
VAD980830988
cc: Jon Terry

On July 23, 2001, I visited the DCDC Metal Shop, Print Shop, and closed Furniture Shop. I also answered some regulatory questions the facility had regarding the management of solid and hazardous waste. I have attached to this memo a copy of my notes from that visit.



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DCDC Site Visit VAD980830988 July 23, 2001

FURNITURE SHOP

Temporary <90-Day Area Furniture Shop-Shipping and Receiving Area

Waste	# of Containers	Accumulation Start Date	Capacity
FURNITURE SHOP			
Methylene Chloride Pallets	19	06/28/2001	55 gallons each
Paint Booth Filters	1	07/11/2001	55 gallons
Methylene Chloride Rags	2	06/27/2001 07/06/2001	55 gallons each
Waste Paint/Solvent	2	07/16/2001 07/13/2001	55 gallons each
Methylene Chloride Stripper	5	06/27/2001 07/06/2001 06/11/2001 06/27/2001 05/13/2001	55 gallons each
Methylene Chloride Stripper Solid	1	06/14/2001	55 gallons
METAL SHOP			
Solvent Rags	1	07/16/2001	55 gallons
Waste Paint/Solvent	1	07/16/2001	55 gallons

All waste is scheduled for pick-up on July 24, 2001.

<90-Day Area Furniture Shop-Storage Area

The area was empty. DCDC moved all drums to the Shipping and Receiving Area for pick-up. Danny Minter of DCDC has performed weekly inspections of the area. Danny Minter will perform the last weekly inspection on July 27, 2001. Charles Kirk of AASE will send letter deactivating <90-day area.

METAL SHOP

Sanding Room

In this room, DCDC is accumulating used and unused paints, solvents, inks, printing chemicals, and unknowns from the Metal Shop and Print Shop. According to Charles Kirk, this material is to be inventoried and managed in accordance with applicable regulations.

Paint Booth

I instructed DCDC and Charles Kirk that the sludge in the bottom of the paint booth needs to be tested to determine if the sludge is a hazardous waste. I suggested that DCDC test for TCLP metals, semi-volatiles, and volatiles.

PRINT SHOP

The Print Shop was collecting more inks and used and unused solvents to take to the Sanding Room.

The Print Shop and Metal Shop are still operating.

Inspector- Stacey M. Rosenquist, Environmental Specialist II